

2025 Annual Public Statement Petrogas North Sea Limited

Reason for issue: for information

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Revision	Date	Author	Reviewer(s)	Approver

CONTENTS

1.	OVERVIEW	3
1.1	BACKGROUND	3
1.2	CURRENT OPERATIONS.....	4
2.	ENVIRONMENTAL MANAGEMENT SYSTEMS.....	5
3.	ENVIRONMENTAL PERFORMANCE.....	8
3.1	ATMOSPHERIC EMISSIONS.....	9
3.2	ACCIDENTAL RELEASES	10
3.3	WASTE	11
3.4	CHEMICAL USE AND DISCHARGE	11
3.5	WELLS DRILLING ACTIVITIES (DRA) CHEMICALS USE AND DISCHARGE	12
APPENDIX A	REFERENCES	13
APPENDIX B	ABBREVIATIONS AND DEFINITIONS.....	13
APPENDIX C	HSE POLICY	14
APPENDIX D	MAP POLICY	15

1. OVERVIEW

1.1 BACKGROUND

Petrogas North Sea Limited (PNS), a subsidiary of Petrogas E&P LLC (refer to Figure 1), serves as the licence operator for three licences situated in the United Kingdom Continental Shelf (UKCS). Of these, two licences (P2025 and P2582) encompass gas discoveries at Birgitta and Abbey. In Q4 2024, PNS drilled an exploration well on its P2433 (Baker) licence in the UKCS, fulfilling its licence obligations. The well successfully confirmed the presence of gas, indicating the potential for commercially viable gas volumes within the area. In 2025, an appraisal well was drilled at Abbey, which was subsequently suspended.

PNS obtained Well Operatorship for Licence P2025, to allow for the drilling of the Birgitta East appraisal well (22/19a-8), on 6 November 2019. A positive result was achieved and PNS is now working towards development of both the Birgitta, Abbey and Baker fields.

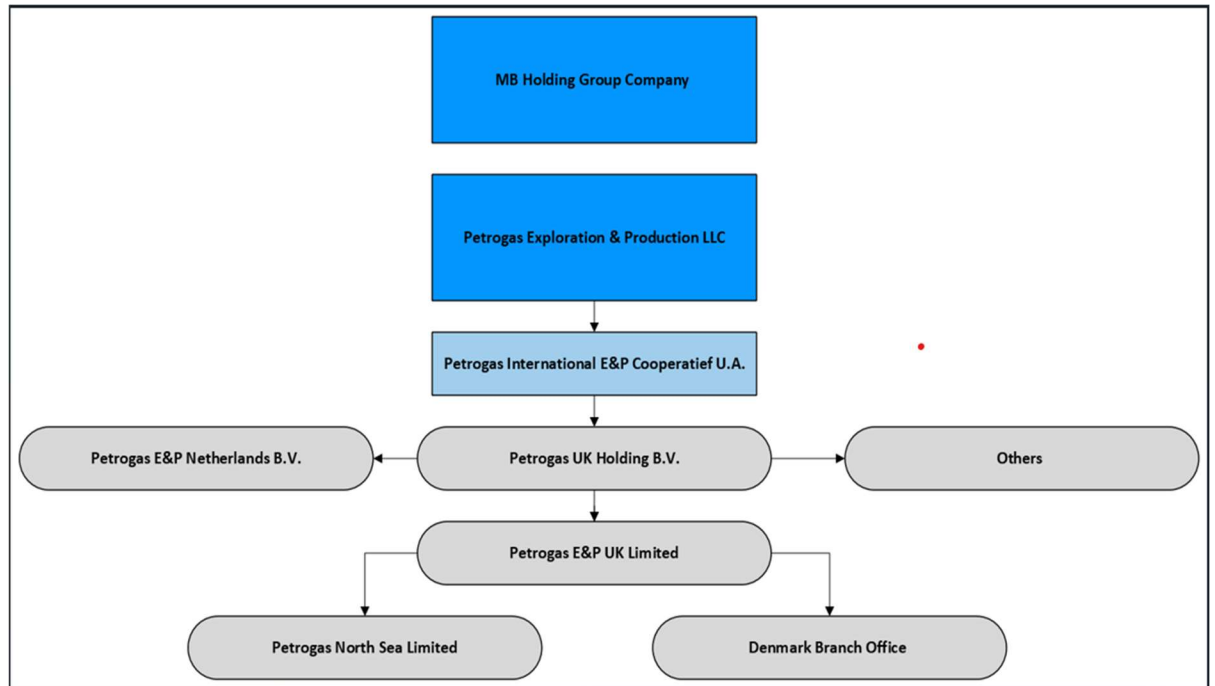


Figure 1 – Company Structure

1.2 CURRENT OPERATIONS

In 2025, a marine survey was undertaken at the proposed Baker production well location and proposed Abbey to Baker pipeline route to obtain geophysical and environmental seabed data. The survey was required to provide information about the baseline data at the Baker location and along the pipeline, and to check feasibility of a potential pipeline between the Abbey Drill Centre and Baker Well Location in the Southern North Sea (SNS). The Abbey/Baker Field project is presently in development and is currently in the Concept Selection phase.

The Birgitta Field is currently being developed and is in the Concept Select phase.

2. ENVIRONMENTAL MANAGEMENT SYSTEMS

PNS operates an ISO14001:2015 certified management system: the Business Excellence Management System (BEMS). The system was certified according to ISO 14001:2015 on 22 September 2021, prior to the commencement of offshore drilling activities on the UKCS. The management system therefore meets the requirements of OSPAR Recommendation 2003/5 to Promote the Use and Implementation of Environmental Management Systems by the Offshore Industry. The BEMS was successfully recertified in June 2024, following a three-year cycle. Annual verification audit was executed in June 2025.

The basis for the management system is the concept of “Plan Do Check Act”, which provides an iterative process to achieve continual improvement in performance. Figure 2 reflects the elements of this process and the relationship to the ISO High Level Structure requirements.

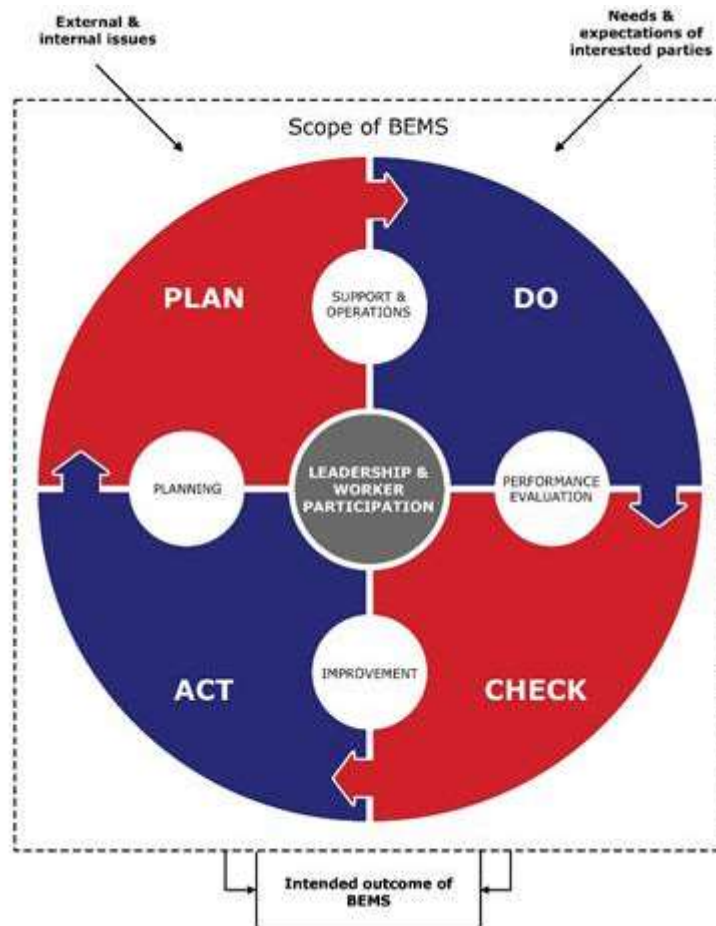


Figure 2: Plan-Do-Check-Act Loop

Figure 3

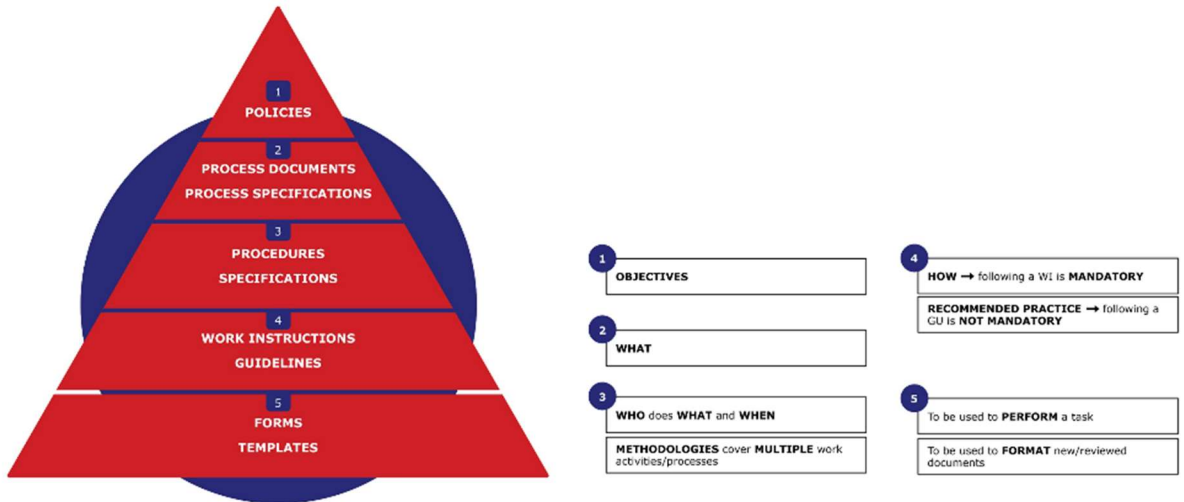


Figure 3 - BEMS Document Structure

The overall documentation structure for the BEMS is illustrated in Figure 3.

The BEMS includes an HSE Policy and Major Accident Prevention Policy (MAPP), as well as relevant safety and environmental processes and procedures as required by the ISO standards. The HSE Policy and MAPP are shown in Appendix C and Appendix D.

Key safety and environmental documents in the BEMS are listed in the table below.

Document Title
BEMS Manual
Business Ethics Policy
Competence Assurance Procedure
Compliance Assurance Process Specification
Emergency Management Process Specification
Environmental Aspects and Planning Procedure
Environmental Stewardship Process Specification
General Management Process Document
HSE Compliance Register
HSE Policy
HSE Risk Management Process Specification
HSEQ Process Document
Incident Investigation and Reporting Process Specification
Logistics Process Document
Major Accident Prevention Policy (MAPP)
Management of Change Procedure – Drilling and Well Engineering
Management of Contractors Procedure
Management System Process Specification
PNS Environmental Aspects Register
Project Compliance Plan
Project Management procedure/system
Well Engineering Process Document

The overall responsibility for BEMS lies with the General Manager, who has committed to its development, implementation and continual improvement. The General Manager shall demonstrate leadership and commitment with respect to BEMS by:

- Taking accountability for the effectiveness of BEMS;
- Ensuring that safety and environmental policies and objectives are established and are compatible with the strategic direction and the context of the organization;
- Ensuring that the resources needed for BEMS are available;
- Communicating the importance of effective safety and environmental management and of conforming to BEMS requirements;
- Engaging, directing and supporting persons to contribute to the effectiveness of BEMS; and
- Promoting continual improvement.

3. ENVIRONMENTAL PERFORMANCE

PNS is not operating any oil and gas assets, therefore, given the project development nature of Petrogas’ operations during 2025, the potential for significant environmental impact arose from its drilling activities and specifically from:

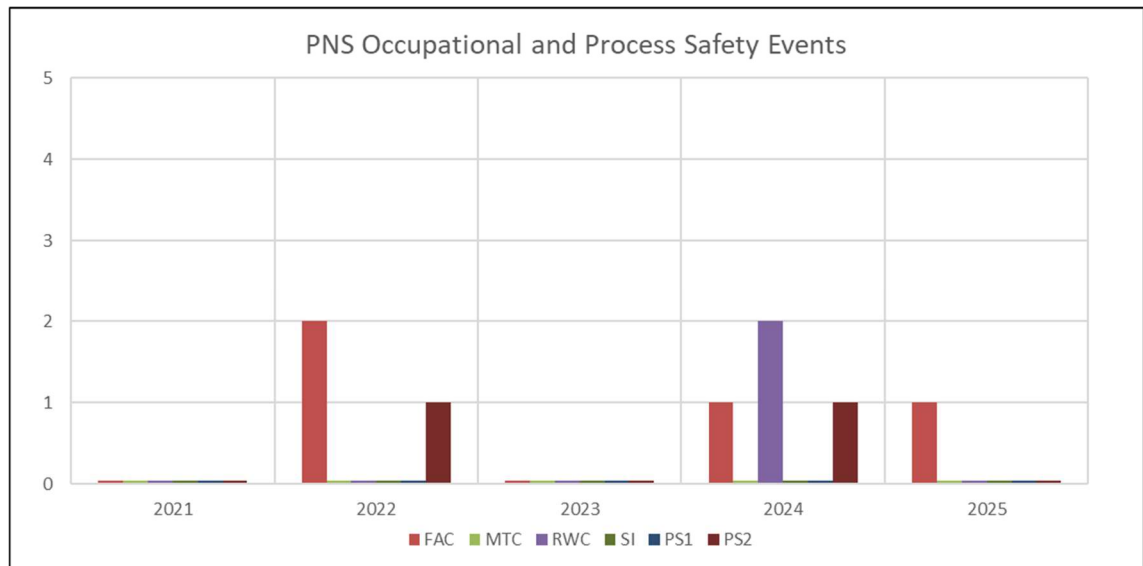
- Atmosphere emissions from power generation;
- Chemical use and discharge;
- Waste management; and
- Accidental releases.

The environmental performance of Petrogas’ operations since 2024 are summarised in the following sections and have been reported to the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) via the UK Environmental Emissions Monitoring System (EEMS).

Petrogas North Sea confirm they have:

- Had no major accidents¹ during the last five years in the North Sea;
- Never been subject to enforcement action by the Regulator in the North Sea;
- Never been subject to criminal or civil action and no such action is pending; and
- Never been convicted for any breaches of legislation.

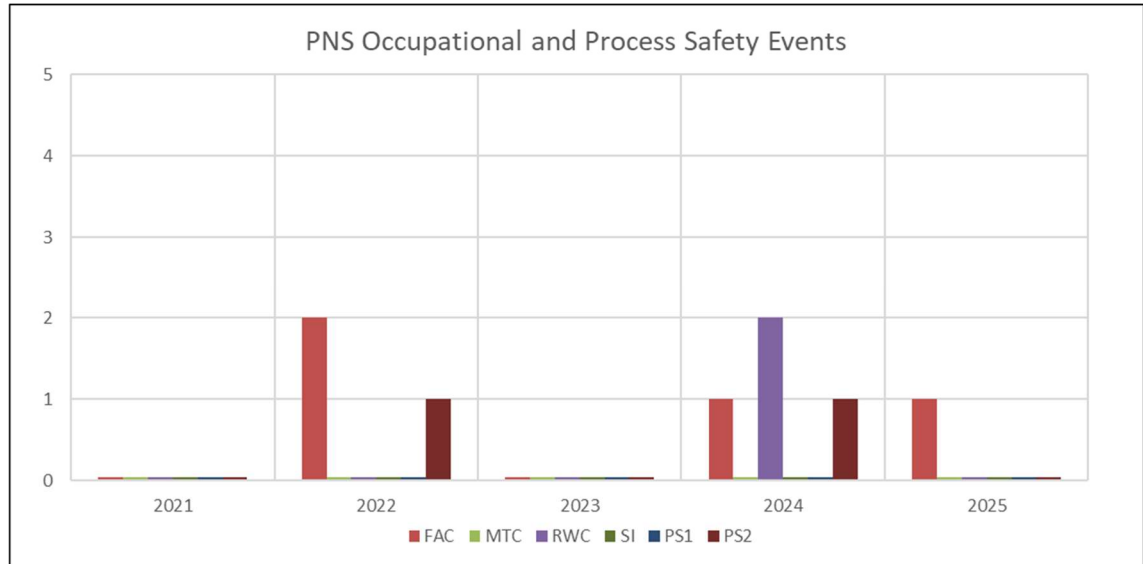
The last 5-years of PNS’ occupational and process safety performance statistics since starting operational activities are shown in



¹ As defined in Article 2(1) of the EU Directive on safety of offshore oil and gas operations (2013/30/EU)

PS1 - Tier 1 Process Safety event may involve significant actual or potential impacts. PS2 - Tier 2 Process Safety Event is an LOPC with consequence. It is an unplanned or uncontrolled release of any material, including non-toxic and non-flammable materials, from a process that results in consequences

Figure 4 below.



PS1 - Tier 1 Process Safety event may involve significant actual or potential impacts. PS2 - Tier 2 Process Safety Event is an LOPC with consequence. It is an unplanned or uncontrolled release of any material, including non-toxic and non-flammable materials, from a process that results in consequences

Figure 4: PNS Occupational and Process Safety Events overview

3.1 ATMOSPHERIC EMISSIONS

Atmospheric emissions from Abbey are derived from the generation of power during the geophysical and geotechnical surveys and from the activities for the drilling of Abbey appraisal well including flaring.

A summary of the atmosphere emission generated from 2025 operations is given below in Table 1.

2018 is set as the baseline year across the UKCS against which the sector must achieve its reduction targets outlined in the North Sea Transition Deal, providing a benchmark for performance against the baseline. The total GHG emissions for the UK upstream oil and gas industry in 2018 was 18.1 million tonnes CO₂e (OEUK, 2025). The latest year for which a full dataset is available is 2024 during, which the total CO₂e emitted by the sector was 12.4 million tonnes (OEUK, 2025).

The emissions from the anticipated vessel use will amount to approximately 0.16 % of the total upstream UKCS emissions in 2018 and approximately 0.237 % of the total upstream UKCS emissions in 2024 and, therefore, represents a relatively small contribution to total UKCS emissions.

Source		Atmospheric emissions (te)			
		CO ₂	N ₂ O	CH ₄	CO _{2eq}
EEMS Emissions Factor ¹		3.2	38.40271	0.90720	-
GWP ²		1	265	28	-
Source	Total tonnes				
Baker/Abbey Pipeline Survey	50	160.00	1.92	0.05	162.27
Abbey Appraisal Drilling	8,990.69	28,824.06	345.31	8.16	29,177.53
Total	9,040.69	28,894.36	347.23	8.20	29,339.79
2018 UKCS CO ₂ Emissions ³		18,100,000	2024 UKCS CO _{2eq} Emissions ³		12,400,000
Total Emissions as a % of UKCS CO ₂ Emissions, 2018		0.16	Total Emissions as a % of UKCS CO _{2eq} Emissions, 2018		0.237

¹ Emissions calculated using DESNZ GHG Conversion Factors for Marine Oil, Expressed in kg Co_{2e} of GHG per unit (DESNZ, 2025).
² CO_{2e} figure is calculated by multiplying CO₂, N₂O and CH₄ by their relevant GWP value (IPCC, 2014).
³ Total CO₂ and CO_{2eq} emissions from UKCS 2018 and 2024 (OGUK, 2025).

Table 1 – Emissions evaluation

The emissions reported in Table 2 represent Scope 3 Category 1 (as per the GHG Protocol); PNS Scope 1 and Scope 2 emissions are relevant to the office support activities, see Table 4 below, and are considered to be negligible given the size of the company.

	Kwh	tCO _{2e}
Electricity	29.58	0.11
Gas	1,175.42	021

Table 2 – Scope 1 & Scope 2 Emissions

3.2 ACCIDENTAL RELEASES

The prevention of oil and chemical releases is of the highest priority during Petrogas' operations, and, consequently, we maintain procedures, training and awareness campaigns in order to minimise the risk of release and to ensure a rapid response to an such event.

Oil and chemical release incidents are reported to OPRED in accordance with the Petroleum Operations Notice 1 (PON1) system. Petrogas was responsible for the occurrence of two such incidents in 2025, a summary of which is provided in Table 3 below.

Reference	Date	Nature of Incidents	Type of spill	Estimated Maximum Quantity Released (Te)	Location
IRS/2025/5948/PON2	19/03/2025	Section of steel handrail	Material	N/A	Abbey
IRS/2025/5776/OCR	12/02/2025	Chemical had exceeded permitted use	Chemical	128.12 kg	Abbey

Table 3 - 2025 Oil and Chemical Release Incidents

3.3 WASTE

In total, 222.83 tonnes of waste was generated from the Abbey operations in 2025. Of this, 180 tonnes consisted of drilling 'slops' that were shipped to shore, after the well was abandoned; this waste was sent for treatment and discharged under the approved consent.

Total Waste (tonnes)	Reused / Recycled (%)	Landfill (%)	WTE (%)	Incineration (%)	Treatment*/Other (%)
222.83	18	23	15	8	36

Table 1 - Fate of Waste Generated from Petrogas Operations in 2025

*The disposal route treats the sludge by separating the water, oil and solids from the material through a thermal process. They are typically able to recycle 90% of the sludge by weight. Any recovered calorific waste is used in waste-to energy.

3.4 CHEMICAL USE AND DISCHARGE

Offshore use and discharge of operations chemicals is regulated by the Offshore Chemical Regulations 2022 (as amended), where the word "chemicals" refers to fully formulated products used offshore, whether these are comprised of one or more distinct chemical substances. Such chemicals must appear on both the Centre for Environmental, Fisheries and Aquaculture Science (CEFAS) Definitive Ranked Lists of Registered Products and on the relevant Chemical Permit application.

All chemicals are tested and classified by CEFAS according to their potential to cause harm. The assessment relates to a combination of the rate of biodegradation, toxicity and potential to bio-accumulate. Environmental data are provided below according to those which are:

- Environmental benign i.e. labelled as **Pose Little Or No Risk (PLONOR)**;
- Low risk i.e. listed in the CEFAS lowest risk categories ('E' or 'Gold' (exclusion PLONOR)); and
- Higher risk i.e. listed in the CEFAS higher risk categories.

Products identified by CEFAS as containing chemicals marked for substitution with a more environmentally friendly alternative are flagged with a "SUB" warning. Use and discharge of such chemicals is included in the following sections.

Petrogas continually work with chemicals suppliers to evaluate the potential environmental hazards of chemicals used, and to select less hazardous alternatives where practicable.

3.5 WELLS DRILLING ACTIVITIES (DRA) CHEMICALS USE AND DISCHARGE

In 2025, Petrogas used 2,533,407.51 kg of chemicals during the Abbey exploration well activities 748,340.11 kg of the chemicals were discharged to the marine environment.

In terms of environmental, only five "SUB" chemicals were and discharged during the operations.

2025 Chemical Use / Discharge (kg)		
	Use	Discharge
Total	2,533,407.51	748,340.11

2025 Chemical Use / Discharge (kg)		
Chemical Label Code	Use	Discharge
PLONOR	1,511,884.68	725,778.15
SUB	862,358.81	3,054.03

Appendix A References

Reference Documents/Forms	
Document Number	Title
PNS-GEN-PY-00001	PNS HSE Policy
PNS-GEN-PY-00002	PNS Major Accident Prevention Policy
PNS-GEN-PY-00003	BEMS Manual
---	GHG Protocol

Appendix B Abbreviations and Definitions

Abbreviations	
Abbreviation	Description
BEMS	Business Excellence Management System
CEFAS	Centre for Environmental, Fisheries and Aquaculture Science
E&P	Exploration and Production
OPRED	Offshore Petroleum Regulator for Environment and Decommissioning
OSPAR	Oslo Paris (agreement)
P&A	Plug and Abandonment
PEPN	Petrogas E&P Netherlands B.V.
PLONOR	Pose Little Or No Risk
PNS	Petrogas North Sea
PON	Petroleum Operations Notice
UKCS	United Kingdom Continental Shelf
WTE	Waste To Energy

Definitions	
Word	Description

Appendix C HSE Policy

HEALTH, SAFETY AND ENVIRONMENT POLICY

PURPOSE AND OBJECTIVES

Petrogas North Sea Limited (hereafter referred as "PNS" or "Company") HSE policy purpose is to protect Workers, the public, our assets and the environment in which we work and live. It is a commitment that is in the best interests of Workers, the environment, our partners and customers and other stakeholders.

The Management of all Health, Safety and Environmental (HSE) aspects within PNS is embedded in the Business Excellence Management System (BEMS), which systematically manages all the BEMS processes.

The HSE objectives and targets are set by the PNS Management Team (PMT) consistent with the Company strategy.

SCOPE

This policy applies to:

- All offices, onshore, and offshore facilities operated by PNS;
- Individuals working for PNS, whether as employees, temporary workers, or self-employed persons (collectively referred to as the 'PNS Workforce'), as well as value chain workers while on duty (together with the PNS Workforce, collectively referred to as 'Workers');
- All the primary and supporting business processes associated with the exploration, production and transportation of oil and gas;
- All the primary and supporting business processes associated with the engineering, construction and decommissioning of oil and gas facilities;
- Relevant management of operated exploration and production licenses;
- Management of contractual relationships with suppliers and service providers upstream and downstream in the PNS value chain.

The management of non-operated stakes is excluded from the BEMS.

POLICY STATEMENTS

- ✦ Our primary objective is to minimise all occupational health, safety, security and environmental risks to as low as reasonably practicable, by engaging Workers to look for the elimination of hazards and when not possible, substitution or control of those hazards.
- ✦ We are dedicated to creating and maintaining a working environment where we minimise impact to the physical and mental health and safety of the Workers. We always look at initiatives aimed at enhancing the overall health, safety, and wellbeing of the Workers. We work with our Value Chain to ensure fair and equitable treatment for their workers.
- ✦ We ensure to effectively respond to any emergencies prioritising the health and safety of all individuals involved and minimising the impact to the environment. We make all required efforts to prevent or mitigate crisis situations.
- ✦ We ensure that our workforce is adequately trained and competent to perform their duties safely and effectively.
- ✦ We work together in fostering an environment where every individual feels safe to start the job and feels free to stop the job, when it is judged to be unsafe for people and/or the environment. We never penalise anyone to stop a job or speaking up about hazards, injuries or undesirable behaviour.
- ✦ We are committed to be a diverse, equitable and inclusive workplace, where the human rights of everyone, including the workers in value chain, are respected. We strive for a place where every voice is heard, and cultural differences are valued.
- ✦ We design, build, operate, apply the latest technologies, where sustainable, and maintain facilities with the highest integrity standards to prevent and mitigate undesirable events and proactively address climate change related impacts within our control.
- ✦ We are dedicated to preventing pollution and mitigating environmental impacts stemming from our operations throughout their whole lifecycle, by improving the energy efficiency of our assets, minimising and/or eliminating emissions, including greenhouse gasses, waste, water discharges, and the use of environmentally harmful substances.
- ✦ We are committed to preventing pollution and reducing environmental impacts across the full lifecycle of our operations. This includes improving energy efficiency, minimising or eliminating emissions (including greenhouse gasses), waste, water discharges, and the use of environmentally harmful substances.
- ✦ We embrace circularity extending the lifespan of the resources we employ by maximising recycling and upcycling opportunities, through innovation and ingenuity.
- ✦ Our ambition extends to have a no negative impact on biodiversity of the areas, and on ecosystems, where we operate.
- ✦ We endeavour to create a more sustainable business minimising the impact associated with our operations on the community we work and live in, by applying thorough due diligence to us and our value chain.
- ✦ We are committed to a culture of continuous learning and improvement, where we actively seek to understand both our successes and our shortcomings. Through the analysis of normal work, best practices, incident investigations and audits, we extract valuable insights to enhance our operations. We share learnings across our organisation to facilitate continuous improvement in all aspects of our work.
- ✦ We enable, promote, and verify compliance with applicable stipulated legal and corporate HSE related requirements.
- ✦ We ensure transparency and we engage with our stakeholders on our relevant positive and negative impacts, and we work with them to maximise and minimise these impacts.

ORGANISATIONAL AND ARRANGEMENTS

The **General Manager (GM)**, as appointed by PNS Board of Directors, is accountable for guiding the organisation and ensuring that adequate resources such as people and finance are available to allow the policy requirements to be achieved. The GM ensures that the organisational HSE and sustainability objectives are set and reviewed annually according to the BEMS requirements.

The **PNS Management Team** members are responsible for ensuring that the objectives of this policy are met and for providing sufficient support to the whole organization to achieve those objectives in full compliance with BEMS.

All managers, supervisors, advisors, and authorised technical engineers will ensure that the principles of the policy and the aims of the objectives are reflected in any instruction, advice or development they are involved with. They will always ensure in their daily work that personal responsibility for the relevant HSE and sustainability aspects is displayed in their behaviour and decisions.

The **Workers** are responsible and accountable for identifying and addressing risks to themselves, others and the environment associated with their workplace and contributing to a safer and more sustainable work environment.



Bart Smits



General Manager

Rev. 6 - 31st March 2025

Appendix D MAP Policy

MAJOR ACCIDENT PREVENTION POLICY

PURPOSE AND OBJECTIVES

Our goal is to protect our people, the public, our assets, the environment in which we work and live and our company reputation. It is a commitment that is in the best interests of our workers, customers and all other associated stakeholders.

We at Petrogas North Sea Ltd (hereafter PNS) recognise that due to the nature of our activities, exposure to major accident hazards could be possible for employees, contractor staff, visitors, members of the public and the environment. We therefore have the obligation to all these stakeholders to reduce the risks associated with such hazards to a level as low as reasonably practicable (ALARP), within our capabilities.

SCOPE

This policy applies to all offices and facilities operated by the PNS organization:

- Including all primary and supporting business processes related to the exploration and production of oil and natural gas;
- Including relevant management of operated exploration and production licences;
- And including management of suppliers/ service providers up- and midstream in the supply chain.

Management of non-operated stakes is excluded from the management system, as is the management of produced oil and gas downstream in the supply chain.

POLICY STATEMENTS

Leadership. The Directors of PNS have mandated the PNS Management Team (PMT) to be responsible for ensuring that all the reasonably foreseeable major accident hazards associated with the PNS operations are identified, assessed and controlled so that the level of risk presented to people and the environment is reduced to as low as reasonably practicable (ALARP). The PMT is responsible for ensuring that our Integrated Business Excellent Management System (BEMS) includes effective arrangements for health, safety, environment, and emergency response. These arrangements must be implemented, maintained, and continuously improved to meet this Policy's commitments and ensure compliance with all applicable legal requirements. Prevention of major accidents is an accountability that ultimately resides with the **PNS General Manager (GM)** and flows down as a responsibility through the line management structure to front line personnel performing work. All **PNS personnel** are responsible for managing major accident hazards relevant to their role. Everyone working for PNS, including contractors, is expected to understand the major hazards in their work area and actively contribute to risk reduction. All are empowered to act if they have any health, safety, or environmental concerns.

Command and Control. PNS:

- ensures that arrangements for the identification, detection, control and prevention of major accident hazards and risks are clear and understood by all relevant people;
- ensures that responsibility and accountability placed on personnel for major accident prevention is made clear in the relevant documents within our management system and supported by associated training programs and contractual arrangements;
- ensures effective management of interfaces between PNS and third-parties by placing on third-parties controls commensurate with the risks associated with their service or product;
- maintains emergency response plans to ensure clarity on the responsibilities and actions required of personnel in the event of a major accident.

Company (Safety) Culture. PNS:

- identifies and uses appropriate methods to reinforce to everyone the importance of major accident prevention;
- provides leadership training to the managers and supervisors that is based around major accident events and major accident prevention;
- maintains strong links with the workforce through facility(-ies) visits and conducting conversations, audits and active monitoring relevant to major accident risk management;
- ensures that conversations between the regulatory bodies, the company management and workers and their representative, where applicable, are conducted and continuous improvement opportunities are discussed and implemented;
- ensures that arrangements are in place for personnel to raise their safety and environmental protection concerns confidentially and securely;
- share improvement campaigns and initiatives which feature major accident prevention themes, designed to promote engagement;
- ensures positive input to safe and environmentally sound behaviour is recognised, shared and awarded;

Competency. PNS:

- ensures that in addition to sharing our core safety value, all personnel engaged are aware of their individual role responsibilities with respect to major accident prevention management and have the competence and training to carry out these responsibilities;
- ensures the competency systems of service providers are reviewed as part of the selection process;
- ensures that training necessary for people to undertake safety and environmentally critical activities is identified and provided (including onboarding and skills and development trainings);
- ensures that ongoing competence assessments address competence in application of barriers to major accidents, and the safety criticality of people's roles is based upon their relevance to the availability and effectiveness of safety and environmentally critical elements.

Operational Control, Auditing and Review. PNS:

- ensures thru BEMS ongoing compliance with statutory requirements for major accident prevention management;
- ensures that effectiveness of the management system is assessed through a program of audits and reviews undertaken by seconded Petrogas E&P International subsidiaries' employees, UK business, local offshore units and independent qualified and reputed auditors;
- consult with our Independent Competent Person to ensure that understanding of the status of barriers against major accidents is validated and act as necessary to correct any shortfalls;
- ensure that the data collected to evaluate the status of major accident prevention controls (e.g. people, procedure and plant) is accurate through technical data security controls, which includes authorisation to access, system event logs and databases.

This Policy is reviewed and approved periodically by the **PMT**.



Bart Smits



General Manager

Rev. 8 - 17th April 2025